EXHIBIT S

EXHIBIT 53

EXHIBIT FILED UNDER SEAL

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

---X
IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT LITIGATION

Case no. 3:24-cv-07019-CRB
Case no. 3:24-cv-07821
Case no. 3:24-cv-7940
Case no. 3:23-cv-06708
Case no. 3:24-cv-04900
---X

*** HIGHLY CONFIDENTIAL ***

VOLUME II

VIDEOTAPED DEPOSITION

OF

SUNNY WONG

TUESDAY, OCTOBER 14, 2025

Reported by:
CANDIDA BORRIELLO
Stenographic Reporter
JOB NO. 6989788-001

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 2      Q.    Yes.

 3              Is the S-RAD score is specifically

 4   a score of the risk of sexual assault or

 5   sexual misconduct for that pairing, right?

 6              MR. PREMO-HOPKINS:   Object to

 7      form.

 8      A.    Well, the model itself, S-RAD, is

 9   trained up on that data, reports of sexual

10   assault, sexual misconduct.  So the score

11   itself is again an assessment from the model.

12      Q.    It's an assessment or a score of

13   the risk of sexual assault or sexual

14   misconduct, right?

15      A.    Correct.

16      Q.    Did you say "correct"?

17      A.    Yes.

18      Q.    And that risk, the risk of sexual

19   assault or sexual misconduct for a given

20   pairing is a risk that matters to Uber,

21   right?

22              MR. PREMO-HOPKINS:   Object to

23      form.  Scope.

24      A.    What do you mean by -- you're gonna

25   have to expand on what do you mean by
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 2         you're gonna instruct him not to

 3         answer, we will go off the record and

 4         get the court involved.

 5              MR. PREMO-HOPKINS:  Ask your

 6         question again.

 7    BY MS. PETERS:

 8         Q.   Does it matter to Uber whether

 9    women are sexually assaulted on trips paired

10    by Uber?

11              MR. PREMO-HOPKINS:  Object to

12         form.  Scope.

13              You can answer to the extent you

14         understand the question.

15         A.   Again, as I mentioned earlier, I

16    mean, we get the S-RAD scores first to

17    understand whether or not we need to flag the

18    trip and potentially intervene using the

19    S-RAD intervention, right, that's part of the

20    S-RAD safety control that we have.

21         Q.   The S-RAD score is a score that's

22    calculated by Uber's -- by a machine-learning

23    program that Uber uses, right?

24         A.   Correct.

25         Q.   That's a program that Uber's data
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 2       form.  Vague.

 3       A.   I wouldn't characterize it that

 4  way.  ████████████████████████

 5     ██████████████████████████████████

 6     ██████████████████████████████

 7     ██████████████████████████████████

 8     ████████████████████████████████

 9     ████████████████████████████

10     ██████████████████

11            MS. PETERS:  Let's go, Dianne,

12       please to Tab 56, a demonstrative

13       scale.

14       Q.   The S-RAD scale is ██████████████

15  right?

16            MR. PREMO-HOPKINS:  I'm gonna

17       object on form and foundation with

18       regard to this demonstrative.

19            MS. PETERS:  And you can have,

20       Counsel, a standing objection to this

21       demonstrative to avoid interruption.

22       Q.   I'm gonna ask the question again.

23            Mr. Wong, the S-RAD score scale is

24  from  ███████████████████████

25  right?
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 2       A.    That's correct.

 3            MR. PREMO-HOPKINS:  And I'm sorry,

 4       Sara, just because I don't know if

 5       this one has come through, is it just

 6       one page, just the one page that we're

 7       looking at?

 8            MS. PETERS:  Yes, there's nothing

 9       else.

10            THE COURT REPORTER:  This is being

11       marked as an exhibit, correct?

12            MS. PETERS:  It's not yet, we're

13       going to keep developing it and then

14       mark it, the demonstrative.

15            THE COURT REPORTER:  Thank you.

16       Sorry.

17            MS. PETERS:  No, thank you.

18       Q.    ████████████████████████████

19  ████████████████████████████████████████

20  ████████████████████████████████████████

21  ████████████████████████████████████████

22  ████████████████████████████████████████

23  ████████   right?

24       A.    ████████████████████  That's correct,

25  yeah.
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 2        Q.    ███████████████████████████████
 3   ███████████████████████████████████████████
 4   correct?
 5        A.    That's correct.
 6              MR. PREMO-HOPKINS:  Objection.
 7        Q.    That is -- strike that.
 8              ████████████████████████████
 9   ██████████████████████████████████████████████
10   ████████████████████████████████   right?
11        A.    I'm just referring to my --
12              THE COURT REPORTER:  I'm sorry, I
13        can't hear you.  It's a little
14        muffled.
15        A.    I was mentioning that I'm referring
16   to my deposition aid, just to look at the
17   average score.
18              Go ahead.  Can you repeat that?
19        Q.    ████████████████████████████████
20   ██████████████████████████████████████████████
21   ██████████████████████████████
22        A.    That's correct.  But it doesn't
23   represent 50 percent which is on the chart
24   average and 50 percent is different --
25   50 percent is the median.  So again, you're
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 2              MS. PETERS:  We -- on a break,
 3         we'd like to find out what that
 4         trigger rate was, please.
 5              MR. PREMO-HOPKINS:  Okay.  Your
 6         request has been noted.
 7              MS. PETERS:  All right.
 8         Q.    So Ms. Dean's score, ████████
 9    ████████████████████████████████
10    ████████████████████████████████
11    ███████   right?
12         A.    It's higher in the daytime in
13    San Francisco, the threshold.
14         Q.    No, I'm talking about something
15    else.  So -- strike that.
16              The score for Jaylynn's trip in
17    November 2015 was higher than the risk score
18    on average for Phoenix at nighttime that
19    month, right?
20         A.    Correct, it was higher than the
21    average, correct.
22         Q.    And it was higher than the cutoff
23    that Uber set to reflect the top risk during
24    San Francisco Bay Area daytime rides in
25    August 2023, right?
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 1              S. Wong - Highly Confidential
 2                  MR. PREMO-HOPKINS:   Object to
 3       form.
 4       A.   Right.  ████████████████████████
 5   ████████████████████████████████████████
 6   ████████████████████████████████████████████
 7   ████████████████████████████████████████
 8   ████████████████████████████████████████████
 9   ███████████████████████████████████████
10   ███████████████████████████████
11   ████████████████████████████████████████
12   ████████████████████████████████████████████
13   ████████████████████████████████████
14   ████████████████████████████████████████████████
15   ██████████████
16       Q.   Move to strike everything after
17   "right" as nonresponsive.
18            And just direct you, Mr. Wong, we
19   have limited time.  Please just answer the
20   question.  I know you have points to make
21   about why those numbers shouldn't be
22   compared, but I'm comparing them, so...?
23                  MR. PREMO-HOPKINS:   Ms. Peters, I
24       ask you to comply with the court's
25       order.  You're not allowed to move to
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 2       screen.

 3            If you understand the question,

 4       you can answer it, Mr. Wong.

 5       A.    Sorry, can you repeat the question?

 6       Q.    Yes.

 7

 8

 9

10

11

12       A.    I mean,

13

14

15

16

17

18

19

20

21

22            MS. PETERS:   Object as

23       nonresponsive.

24       Q.    My question is simply, in this

25    dataset that Uber looked at it found that the
```

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2   ████████████████████████████████

3   ███████████████████████████████

4   ████████████████████████████████

5   ████████████████

6   A.   ███████████████████████

7   ███████████████████████

8   ██████████████████████

9   ████████████████████████

10   ██████████████████████████████

11   ███████████████████████

12   ███████████████████████

13   ████████████████████████

14   █████████████████

15   MS. PETERS: Object as

16   nonresponsive.

17   Q.   I'm not asking about safety impact,

18   I'm not asking about actions that Uber could

19   take. I'm simply asking about this data.

20   And so again, ██████████████

21   ████████████████████

22   ████████████████████

23   ████████████████████████

24   ████████████████████

25   ██████████ right?

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2   A.   ████████████████████████

3   ██████████████████████████████████

4   ██████████████████████████████████

5   ████████████████████████████████

6   ███████████████████████████████

7   ████████████████████

8   Q.   Is that a "yes" to my question?

9   A.   ██████████████████████

10 ███████████████████████████████

11 ███████████████████████████████

12 ████████

13   Q.   Is that a "yes" to my question?

14   A.   ██████████████████████

15 ██████████████████████████████

16 ████████

17   Q.   No. I'm asking: ████████████

18 ████████████████████

19 ██████████████████████████████████████

20 ████████████████████████

21 ████████████████████████████████

22 ██████████████

23   A.   Again, ████████████████████

24 ████████████████████████████████

25 ████████████████████

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2   ████████████████████████████████

3   █████████████████████████████████████

4   ███████████████████████████████████████

5   ████████████████████████████████

6   ██████████████████████

7   Q.   Can you answer my question with a

8   yes or no?

9   A.   ██████████████████████████

10   ███████████████████████████████████████

11   ████████████████

12   Q.   Right. But we had another

13   deposition where we established what recall

14   means and what trigger rates mean, and I

15   don't want to redo all of that. I want to

16   use plain language that is understandable to

17   people who don't work in Uber's data science

18   team.

19   So I'm translating this, and can

20   you please let me know, can you answer yes or

21   no, is it true that ███████████████████

22   ███████████████████████████████████████

23   ██████████████████████████████

24   ███████████████████████████████████

25   ██████████

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 2       A.    ████████████████████████████
 3    ████████████████████████████████████
 4    ██████████████████████████████████████
 5    ████████████████████████████████
 6    ██████████████████████████████████████
 7    ██████████████
 8       Q.    You're saying ████████████████
 9    ████████████████████████████████████████
10    ████████████████████████████████████
11    ████████████████████████████████████
12    ████████████████████████████████████
13    ████████████████████████████████ right?
14            MR. PREMO-HOPKINS:   Object to
15    form.
16       A.    First, ████████████████████████
17    ████████████████████████████████████████
18    ████████████████████████████████████
19    ████████████████████████████████████
20    ████████████████████████████████████
21    ████████████████████████████████████
22    ████████████████████████████████████
23    ██████████████████
24       Q.    With that caveat, is that a "yes"
25    to my question?
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 2      A.    ██████████████████████████████

 3   ████████████████████████████████████████

 4   ███████████████████████████████████

 5      Q.    I'll rephrase it.

 6      A.    Okay.

 7      Q.    The ███████████ -- strike that.

 8             ████████████████████████████████

 9   ███████████████████████████████████████████

10   ████████████████████████████████████

11   ███████████████████████████████████████████

12   ████████████████████████████████████████

13   ██████████████████

14             MR. PREMO-HOPKINS:  Object to

15      form.

16      A.    Yeah.  ████████████████████████

17   ████████████████████████████████████████

18   ██████████████████████████████████

19   ████████████████████████████████████████

20      Q.    Is that a "yes" to my question?

21             MR. PREMO-HOPKINS:  No, it's not,

22      because ███████████████████████████████

23   ███████████████████████████████  So I want to

24      make sure we're, you know -- it's not

25      a "yes" to your question.
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2            MS. PETERS:  Let me ask it again

3      with your word in there.

4      Q.    ████████████████████████████

5   ████████████████████████████████████

6   ██████████████████████████████████

7   ██████████████████████████████████

8   ████████████████████████████████████

9   ██████████████████████

10     A.    Correct, for this dataset.

11     Q.    ████████████████████████████

12  ████████████████████████████████████

13  ██████████████████████

14            MR. PREMO-HOPKINS:  Object to

15      form.

16     A.    Again, ██████████████████████

17  ████████████████████████████████████

18  ████████████████████████████████████

19  ████████████████████████████████████

20  ████████████████████████████████████

21  ██████████████████████████████

22     Q.    Uber already had this analysis by

23  the time it paired Jaylynn with Mr. Turay,

24  right?

25     A.    I mean this is an analysis that
```

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2   unresponsive.

3   Q.   And direct you please to just

4   answer the question.

5   MR. PREMO-HOPKINS: Ms. Peters,

6   he's being incredibly responsive to

7   your imprecise question. So if you

8   want to ask a more precise question,

9   you might be able to get the answer

10   you're looking for, but he's

11   responding directly to your questions.

12   Q.   Mr. Wong, ███████████████████

13   ██████████████████████████████████

14   ████████████████████████████████████

15   ██████████████████████████████████████

16   ████████████████████████████████████

17   ████████████

18   MR. PREMO-HOPKINS: Object to

19   form. Scope.

20   A.   I do not know that, that's outside

21   my --

22   (Court Reporter clarification.)

23   A.   -- not something I have readily

24   available.

25   Q.   And then shifting to Phoenix, are

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2   form. Scope.

3   A.   I am not. I just know that ███

4   ██

5   ████████████████████████

6   Q.   Okay. ████████████████████████

7   ██████████████████████████████████████

8   ████████████████████████████████████

9   ██████████████████████████████████████

10   ████████████████████████████████████

11   ██████████████████████████████████████

12   ████████████

13   MR. PREMO-HOPKINS: Object to

14   form. Scope.

15   A.   I have no way to know that. Again,

16   all I know is that ████████████████████████

17   ██████████████████████████████████████

18   ████████████████████████

19   Q.   And so on behalf of Uber, ████████

20   ██

21   ██

22   ████████████████████████████████████

23   ██████████████████████████████████

24   ████████████

25   MR. PREMO-HOPKINS: Object.

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2   Scope.

3   A.   Again, I don't know that because

4   ██████████████████████████████████████

5   ████████████████████████████

6   Q.   ████████████████████████████

7   ██

8   ████████████   right?

9   A.   Correct.

10   Q.   And there's or -- I'm sorry, was it

11   ██████████

12   A.   ██████████████████████████████

13   ████████████████████████████████

14   Q.   That threshold is one that Uber

15   picked, right?

16   A.   That was the one we configured for

17   ██

18   ██████████████

19   Q.   Did you say Uber configured it?

20   A.   That was the threshold we came up

21   with.

22   Q.   And when you say "we," you're

23   talking about Uber, right?

24   A.   Correct.

25   Q.   Uber came up with that threshold of

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 2     ████   right?

 3        A.    Correct.

 4        Q.    And there's no regulation or

 5   outside rule that says Uber has to accept

 6   pairings with scores ██████████████  when it

 7   makes ████████████████  in Phoenix, right?

 8              MR. PREMO-HOPKINS:  Object to

 9        form.  Scope.

10        A.    Not that I know of.

11        Q.    Uber, if it wants to, can set its

12   risk tolerance lower, right?

13              MR. PREMO-HOPKINS:  Same

14        objection.

15        A.    Again, we've aligned on our trigger

16   rate at █████  nationally and, you know, that's

17   the, you know, ██████████████████████████████

18   ███████████████████████████████████████████

19   ████████████████████████████████████████████

20   ███████████████████████████████████████████

21        Q.    Mr. Wong, we know that Uber can set

22   the trigger rate lower if it wants to because

23   as we just discussed it did set the trigger

24   rate or rather the threshold -- strike that.

25   Start over.
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 2       A.    Hasn't made its way across yet.

 3       Q.    Actually, scroll up from there.

 4       A.    Okay.

 5       Q.    So on page 2 it turns out --

 6       A.    Can you give me a second to look at

 7  this?  I don't know if I've seen this

 8  recently.

 9       Q.    Sure.

10       A.    (Document review.)

11       Q.    You ready?

12       A.    Give me one more minute.  Sorry.

13             (Document review.)

14             Okay.

15       Q.    So looking at page 2 of

16  Exhibit 2202 under the heading Initial

17  Findings and then Item 2, Cities.  This Uber

18  document says:

19             We looked at L12 week's IPC data to

20  identify cities with highest incidences of

21  sexual assaults.

22             And then sub-point A says:

23  ████████████████████████████████████████

24  ████████████████████████████████████████

25  ██████████████████████
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2   Do you see that?

3   A.   I see that.

4   Q.   And if we go to the next portion of

5   that same page, those cities, the ones with

6   the highest incidents of sexual assault, are

7   listed and ██████████████████████████████████

8   ███

9   █████████████

10   Do you see that?

11   A.   I'm able to see that.

12   Q.   And again, ████████████████████████

13 ████████████ the way that Uber grouped cities

14 geographically, right?

15   A.   That's true. From like a city ID

16 perspective, ████████████████████████████████

17 ████████████████████████████████████

18 ██████████████████████████████████ so I

19 just want to mention that.

20   Q.   All right.

21   MS. PETERS: Let's go ahead and

22   take that down, please.

23   Q.   Did -- ███████████████████████████

24 ██

25 ██

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2   Q.   All right. If we go to the next

3   page, please. This is just a hypothetical.

4   ██

5   ██

6   █████████████████████████

7   Do you see that?

8   A.   I do see that.

9   MR. PREMO-HOPKINS: Object to the

10   questioning on the demonstrative. Can

11   I have a standing objection on this

12   one as well, Sara?

13   MS. PETERS: Yes.

14   Q.   And then the other S-RAD scores for

15   other potential trips are hypothetical S-RAD

16   scores that we made up.

17   ████████████████████████

18   ██

19   ████████████████

20   MR. PREMO-HOPKINS: Object to

21   form. Scope.

22   A.   Yep, I see some hypothetical scores

23   and mapped to hypothetical yellow cars on

24   this, yes.

25   Q.   Okay. So the -- this is just to

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 2   demonstrate how S-RAD worked in November of

 3   2023 in the Phoenix area.  And so if

 4   hypothetically this was the situation where

 5   there were other trips available, ████████

 6   ████████████████████████████████████  than

 7   the Jaylynn Dean-Turay pairing.

 8              Then if we go to the next page, ████

 9   ████████████████████████████████████████

10   ████████████████████████████████████████████

11   ███████████████████████████

12              MR. PREMO-HOPKINS:  Object to

13       form.  Scope.

14       A.   Yeah, I mean if it's above the

15   threshold, yes, then it would not be

16   considered.  █████████████████████████████

17   ████████████████████████

18       Q.   Right.  And in that time in

19   November of 2023 in Phoenix, was Uber just

20   █████████████████████████████████████

21   █████████████████████████████████████

22   █████████████████████

23              THE COURT REPORTER:  I'm sorry.

24       You sounded like you broke up.

25       A.   Sorry.  I was asking for a minute
```

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 1            S. Wong - Highly Confidential
 2    just so I can refer back to my dep aid, so I
 3    can get some timelines.
 4         Q.   Yep.
 5         A.   According to my dep aid, as of
 6    November for that particular trip,
 7    November 15, 2023, ███████████████████████
 8    ██████████████████████████
 9         Q.   And so --
10         A.   Yeah.
11         Q.   -- under this hypothetical scenario
12    at that time, ██████████████████████████████
13    ████████████████████████████████████████
14    ████████████████████████████████████████
15    ████████████████████████      right?
16         A.   Yes, ██████████████████████
17    ████████████████████████████████    that's
18    correct.
19         Q.   The supply plan again is a
20    potential driver-rider pairing, right?
21         A.   Right.
22         Q.   So then ████████████████████████
23    ████████████████████████████████
24    ████████████████████████████████████
25    ████████████████████
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 1              S. Wong - Highly Confidential

 2              Then if we go to the next page, ███

 3    ████████████████████████████████████████████

 4    ████████████████████████████████████████████

 5    ██████████████████████████████████  right?

 6              MR. PREMO-HOPKINS:  Object to

 7    form.  Scope.

 8         A.   Again, based on -- it -- again,

 9    ████████████████████████████████████████████

10    ████████████████████████████████████

11    ████████████████████████████████████████████

12    ████████████████████████████████████████████

13    ██████████████████████████████████████

14    ████████████████████████████████████████████

15    ████████████████████████████████████████████

16   ████████████████████████████████

17         Q.   Right.  In other words, Uber is

18    still going to look at things like wait time

19    to help decide who it paired Jaylynn with; is

20    that correct?

21         A.   Yeah, potentially one of the

22    things, exactly.

23         Q.        ████████████████████████

24    ████████████████████████████████████████████

25    ████████████████████████████████████████████
```

1   S. Wong - Highly Confidential

2   ████████████████████████████████

3   ████████████████████████████████

4   ████████   right?

5   A.   ████████████████████

6   Q.   Is that correct?

7   A.   ████████████████████████

8   ████████

9   Q.   Was there any other program Uber

10   used other than S-RAD to try to downrank or

11   avoid pairing Jaylynn with Mr. Turay because

12   of the risk of sexual assault or sexual

13   misconduct?

14   A.   Not that I know of.

15   Q.   Are you aware of any other program

16   that Uber uses when it makes a pairing of a

17   rider with a driver other than S-RAD that

18   tries to avoid trips that have a high risk

19   for sexual assault or sexual misconduct?

20   A.   Not specifically outside of

21   pairings.

22   Q.   I didn't understand that.

23   So I'm just talking about pairings

24   specifically. When Uber paired Jaylynn with

25   Mr. Turay, was it using any other program

1   S. Wong - Highly Confidential

2   Q.   Isn't it true Uber did nothing

3   after it determined she was -- ███████████

4   ████████████████████████ it did nothing

5   further to try to choose the safest of the

6   trips ███████████████ for her?

7   MR. PREMO-HOPKINS: Object to

8   form.

9   A.   There was -- at that point ███████

10   ████████████████████████████████████

11   ████████████████████████████████

12   █████████████████████████

13   Q.   What did Uber do after it

14   determined that Jaylynn's trip was ██████████

15   ██████████   What is it it did further to try

16   to make sure it was picking the safest match

17   possible for her?

18   MR. PREMO-HOPKINS: Object to

19   form.

20   A.   Again, I don't know what other

21   plans were available at that time period,

22   right, to say whether or not that was -- if

23   there were other scores that were lower.

24   Q.   Right. But you don't need to know

25   whether there are others available 'cause you

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 1              S. Wong - Highly Confidential

 2    know ████████████████████████████████

 3    ██████████████████████████████████████

 4    ██████████████████████████████████████

 5    ███████████████████████████████████

 6    █████████████████████████████████

 7    right?

 8         A.    Correct.  And at that point then

 9    █████████████████████████████████

10    ███████

11         Q.    Right.

12               MS. PETERS:  We can take that

13    down.

14         Q.    To be clear, Jaylynn did not have

15    any choice to select from available drivers,

16    right?

17               MR. PREMO-HOPKINS:  Object to

18    form.  Scope.

19         A.    That's not part of the Uber trip

20    requests -- process.  We don't get to select

21    individual drivers.

22         Q.    No, I mean Uber does select

23    individual drivers, but the rider, Jaylynn,

24    did not, right?

25         A.    That's correct.
```

1   S. Wong - Highly Confidential

2   A.   Driver one-star rate total,

3   correct.

4   Q.   And Mr. Turay's one-star rate,

5   meaning how many one-star ratings he received

6   as a fraction of all ratings he received, was

7   1.07 percent, right?

8   A.   Correct.

9   Q.   ████████████████████████████

10   ████████████████████████████████

11   ██████████████████████████████████████

12   ██████████████████████████████████████

13   ███████████████████████

14   A.   ████████████████████████

15   █████████████████████████

16   Q.   Directing you back to my question.

17   ████████████████████████████

18   ██████████████████████████████

19   ████████████████████████████

20   ██████████████████████████████

21   ████████████████████████████████████

22   ████████████████████████████

23   ██████

24   MR. PREMO-HOPKINS: Object to form

25   the.

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 1              S. Wong - Highly Confidential
 2         A.    And I was mentioning that it's,
 3    again, ████████████████████████████
 4    ████████████████████████████████████
 5    ██████████████████
 6         Q.    Is that a "yes"?
 7         A.    Yes.
 8         Q.    The one-star rate of 1.07 percent
 9    is more than double the median one star rate
10    for drivers in the Phoenix area, right?
11         A.    Based on the previous seven-day
12    calculation that the team did that determined
13    that the median driver one-star rating was
14    .45 percent.  But even for this particular
15    driver, that 1 percent is higher, but I would
16    argue that that's still a very small rate.
17         Q.    But please don't argue because this
18    is our chance to ask questions and just get
19    answers and there will be other times for you
20    to give context and argument.
21              So again, I just want to object as
22    nonresponsive and direct you back to my
23    question.
24              Mr. Turay's one-star rate of
25    1.07 percent was more than double the median
```